



August 24, 2017

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: Comment on Rate-of-Return Study Areas Potentially 100 Percent Overlapped by  
Unsubsidized Competitors, WC Docket 10-90

Dear Ms. Dortch:

On August 11, 2017, the Federal Communications Commission (Commission) released a Public Notice in which the Wireline Competition Bureau (Bureau) published a list of study areas potentially subject to the 100% overlap rule. The Commission seeks comment on whether the competitors in the study area codes (SACs) listed are offering voice and broadband to 100% of locations in the relevant census blocks meeting the requirements in 47 CFR § 54.319(a). The Commission has defined an unsubsidized competitor as “a facilities-based provider of residential fixed voice and broadband service that does not receive high-cost support.”

Using Form 477 data from June 30, 2016, the Commission identified thirteen rate-of-return study areas as potentially 100% overlapped by an unsubsidized competitor or combination of unsubsidized competitors. In the list, the Bureau listed Bascom Mutual Telephone Company (Bascom), SAC 300589, as one such area and identified WATCH TV as a competitive provider.

This letter is to inform the Bureau that WATCH TV does not offer fixed broadband and voice service in accordance with the Commission’s service obligations for universal service to all locations within the Bascom SAC referenced in the Public Notice. Although WATCH TV provides service within the Bascom SAC, it is unable to serve all subscribers in Bascom’s SAC given its technology, terrestrial fixed wireless, has line-of-site limitations. WATCH TV therefore refutes the results of the Commission’s preliminary analysis.

Sincerely,

A handwritten signature in dark ink that reads "Ken Williams". The signature is written in a cursive, flowing style.

Ken Williams  
President and CEO  
W.A.T.C.H. TV Company